

## THE SAMUEL LAW FIRM

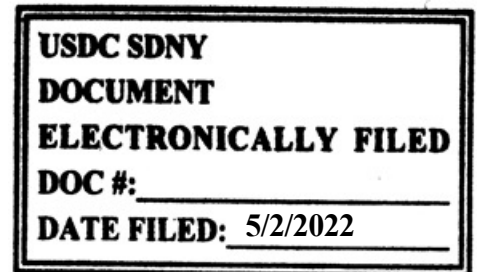
1441 BROADWAY, SUITE 6085, NEW YORK, NY 10018

PHONE: (212) 563-9884 | FAX: (212) 563-9870 | WEBSITE: [www.samuelandstein.com](http://www.samuelandstein.com)

MICHAEL SAMUEL  
[michael@thesamuellawfirm.com](mailto:michael@thesamuellawfirm.com)

April 29, 2022

ADMITTED IN NY



VIA ECF

Hon. Katharine H. Parker  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Ramon A. Belliard v. Vadim Tarnovsky et al.***  
**20-cv-1055 (KHP)**

APPLICATION GRANTED

*Katharine H. Parker*  
Hon. Katharine H. Parker, U.S.M.J.  
5/2/2022

Dear Judge Parker:

We represent Plaintiff Ramon A. Belliard and write to respectfully request, pursuant the Rule 1. C. of this Court's Individual Practices in Civil Cases, that the Court grant Plaintiff a two-week extension of time, until May 13, 2022, to file his motion for default judgment, pursuant to this Court's Order dated April 7, 2022 (ECF # 21).

Plaintiff is preparing his motion for default, however the Passover holiday and business-related international travel of Andrew D. Beresin, counsel to this Firm, who is in process of completing the default motion, has delayed its completion, which Plaintiff's counsel respectfully regrets. Our response to Your Honor's most recent order had previously been due today, April 29, 2022, and no previous requests for extension of time have been submitted.

We thank the Court for its consideration and attention to this matter.

Respectfully submitted,

/s/ Michael Samuel  
Michael Samuel, Esq.  
The Samuel Law Firm

*Attorneys for Plaintiff*